

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

JIM T. GLOVER, JR.,	)	CASE NO. 1:18-cv-01134
	)	
Plaintiff,	)	
	)	
vs.	)	MAGISTRATE JUDGE
	)	WILLIAM H. BAUGHMAN, JR.
CORPORAL BOARDMAN, et al.,	)	
	)	<b><u>RESPONSE TO MOTION TO</u></b>
Defendants.	)	<b><u>WITHDRAW</u></b>
	)	

Defendants do not object to counsel's motion to withdraw from their representation of plaintiff in this case. Should the Court determine that it requires additional information, however, Defendants submit that an ex parte status conference would be inappropriate. Nevertheless, Defendants understands counsels' obligation to protect privileged communications. To that end, Defendants alternatively request that any such additional information (again, if necessary) be provided via memorandum to the Court; through an ex party status conference with a magistrate who is not presiding over these proceedings; or some other method of the Court's choosing.

Respectfully submitted,

**MICHAEL C. O'MALLEY,**  
**Prosecuting Attorney of Cuyahoga County, Ohio**

By: /s/Jake A. Elliott  
Jake A. Elliott (0093521)  
Assistant Prosecuting Attorney  
CUYAHOGA COUNTY PROSECUTOR'S OFFICE  
The Justice Center, Courts Tower  
1200 Ontario Street, 8th Floor  
Cleveland, OH 44113  
(216) 443-5756  
[jelliott@prosecutor.cuyahogacounty.us](mailto:jelliott@prosecutor.cuyahogacounty.us)

*Counsel for Defendants Cpl. Steve Boardman  
and Officer Philip Irion, Jr.*

**CERTIFICATE OF SERVICE**

I hereby certify that on August 31, 2021, the foregoing was filed electronically. Notice of this filing will be sent to all parties for whom counsel has entered an appearance by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/Jake A. Elliott  
Jake A. Elliott (0093521)  
Assistant Prosecuting Attorney